

## Matthew Nace

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**From:** Matthew Nace  
**Sent:** Tuesday, December 1, 2020 11:55 AM  
**To:** ngolay@vglaw.org; nmagdeburger@pklaw.com; erhoades@adclawfirm.com  
**Subject:** Regarding: Fraley, Tammie, et al. v. Meritus Medical Center, INC., et al.  
**Attachments:** Motion for Leave to Re-Issue Summons and Modify Schedulign Order.pdf  
  
**Importance:** High

Dear Counsel,

I was drafting this motion to circulate today before filing, in light of your motion that was just filed, I assume you are not consenting, but please advise if you do and are willing to withdraw your presently filed motion.

**PAULSON & NACE, PLLC**  
ATTORNEYS AT LAW

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### MATTHEW A. NACE

1025 Thomas Jefferson St., NW, Suite 810  
Washington, DC 20007

**PH** 202.463.1999 | **FAX** 202.223.6824

[man@paulsonandnace.com](mailto:man@paulsonandnace.com)

[www.paulsonandnace.com](http://www.paulsonandnace.com)

*Admitted in DC, MD & WV*